

# **EXHIBIT A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE-----X  
JAEDEN MONK,

Index No:

Plaintiff,

**SUMMONS**

-against-

KLLM TRANSPORT SERVICES, LLC and  
TYRIK DASHAUN MASTERS,Plaintiff(s) designate(s) Orange  
County as the place of trial

Defendants.

The basis of venue is  
CPLR 503(a)-----X  
To the above named defendant(s) :

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to service a copy of your answer, or, if the complaint is not served with this summons, to service a notice of appearance, on the Plaintiffs' Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Middletown, New York  
June 8, 2022

Yours, etc.,

**PATRICK S. OWEN, PLLC**

By:

**PATRICK S. OWEN, ESQ.**Attorney for Plaintiff(s)  
250 Crystal Run Road  
Middletown, New York 10941  
Tel. No.: (845) 692-8000**Defendant's Address(es):**KLLM TRANSPORT SERVICES, LLC  
135 Riverview Drive  
Richland, MS 39218TYRIK DASHAUN MASTERS  
3621 Halls Ferry Road  
Vicksburg, MS 39180

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

-----X  
JAEDEN MONK,

Index No:

Plaintiff,

**VERIFIED COMPLAINT**

-against-

KLLM TRANSPORT SERVICES, LLC and  
TYRIK DASHAUN MASTERS,

Defendants.  
-----X

Plaintiff, JAEDEN MONK, by and through his attorney, PATRICK S. OWEN, PLLC, as  
and for his Verified Complaint, herein alleges as follows:

1) That at all times hereinafter mentioned, upon information and belief, the Plaintiff,  
JAEDEN MONK, was and still is a resident of the County of Ulster, State of New York.

2) That at all times hereinafter mentioned, upon information and belief, the Defendant,  
TYRIK DASHAUN MASTERS, was and still is a resident of the County of Warren, State of  
Mississippi.

3) That at all times hereinafter mentioned, upon information and belief, the Defendant,  
KLLM TRANSPORT SERVICES, LLC, was and is a foreign limited liability company,  
organized and existing under the laws of the State of Mississippi.

4) That at all times hereinafter mentioned, upon information and belief, the Defendant  
KLLM TRANSPORT SERVICES, LLC, was and is a foreign limited liability company,  
authorized to do business within the State of New York.

5) That at all times hereinafter mentioned, upon information and belief, the Defendant,  
KLLM TRANSPORT SERVICES, LLC, was the registered owner of a certain 2021 Freightliner  
vehicle bearing license plate A490130 for the State of Mississippi.

6) That at all times hereinafter mentioned, upon information and belief, the Defendant, KLLM TRANSPORT SERVICES, LLC, was the titled owner of a certain 2021 Freightliner vehicle bearing license plate A490130 for the State of Mississippi.

7) That at all relevant times mentioned herein, upon information and belief, Defendant KLLM TRANSPORT SERVICES, LLC, was the registered owner of a certain trailer bearing Mississippi license plate 138732A.

8) That at all relevant times mentioned herein, upon information and belief, Defendant KLLM TRANSPORT SERVICES, LLC, was the titled owner of a certain trailer bearing Mississippi license plate 138732A.

9) That at all times hereinafter mentioned, upon information and belief, the Defendant, TYRIK DASHAUN MASTERS, was the operator of the aforementioned 2021 Freightliner vehicle with the aforementioned trailer attached with the express and or implied consent of the aforementioned owner.

10) That at all times hereinafter mentioned, upon information and belief, the Defendant, TYRIK DASHAUN MASTERS, operated the aforementioned 2021 Freightliner vehicle while in the course and scope of his employment with the Defendant, KLLM TRANSPORT SERVICES, LLC

11) That at all times hereinafter mentioned, upon information and belief, the Plaintiff, JAEDEN MONK, was the operator of a 2007 Honda motor vehicle bearing license plate KJH9074, owned by, Kristie Stegall, not a party herein.

12) That on the 9<sup>th</sup> day of August, 2021, the trailer of the motor vehicle operated by the Defendant, TYRIK DASHAUN MASTERS and owned by Defendant KLLM TRANSPORT SERVICES, LLC, came into contact with the vehicle operated by the Plaintiff, JAEDEN MONK.

13) That on the 9<sup>th</sup> of August, 2021, while the plaintiff was legally operating his motor vehicle, the Defendant, TYRIK DASHAUN MASTERS, so negligently, carelessly and recklessly conducted the operation, management and control of the trailer attached to the motor vehicle owned by Defendant, KLLM TRANSPORT SERVICES, LLC as to cause and permit it to strike the motor vehicle Plaintiff, JAEDEN MONK was confined in, with such great force, that it inflicted it upon him serious physical injuries, which have resulted in great bodily harm, pain, suffering, loss of enjoyment of life, and damages for medical expenses and lost wages.

14) That as a result of the aforesaid accident, the Plaintiff, JAEDEN MONK, sustained serious physical injuries as defined in Insurance Law § 5102(d) of the State of New York, and/or has sustained or will sustain, economic loss in excess of "basic economic loss" as defined in Insurance Law § 5102(a) of the State of New York.

15) This action falls within one or more of the exceptions as set forth in CPLR 1602, specifically, the motor vehicle exception.

16) That as a result of the foregoing, the Plaintiff, JAEDEN MONK, sustained serious and severe injuries to his mind and body, a shock to his nervous system, and has been caused to suffer severe physical pain and anguish as a result thereof, and upon information and belief, some of these injuries are of a permanent and lasting nature; that plaintiff has been confined to hospital, bed and home as a result thereof, has been caused to abstain from employment and lost income and has become responsible for expenses related to the treatment of said injuries, all to his damage in a sum exceeding the monetary jurisdictional limits of all lower courts.

WHEREFORE, plaintiff(s) demand(s) judgment against the defendant(s), and each of them, in a sum exceeding the monetary jurisdictional limits of all lower courts, to be determined by a jury as fair, just and adequate; together with the costs and disbursements of this action.

Dated: Middletown, New York  
June 8, 2022

Yours, etc.,

**PATRICK S. OWEN, PLLC**

By:

A handwritten signature in black ink, appearing to be 'PS Owen', written over a horizontal line.

**PATRICK S. OWEN, ESQ.**

Attorney for Plaintiff(s)

250 Crystal Run Road

Middletown, New York 10941

Tel. No.: (845) 692-8000

*State of New York*     )

ss.:

*County of Orange*     )

I, the undersigned, an attorney duly admitted to the practice of law in the Courts of the State of New York, state that I am the attorney of record the plaintiff(s) in the within action; I have read the foregoing VERIFIED COMPLAINT and know the contents thereof; the same is true to my own knowledge, except to those matters therein alleged to be on information and belief, and as to those matters I believe to be true. The reason this verification is made by me and not by plaintiff(s) is because plaintiff(s) do(es) not reside and/maintain its office and/or principal place of business in the same county which affirmant maintains his office.

The grounds of my belief as to all matters not stated upon my own knowledge are based upon records of the plaintiff(s), investigation and/or conversations with the plaintiff(s).

I affirm the foregoing statements pursuant to CPLR 2106, aware of the penalties for perjury.

Dated: Middletown, New York  
June 8, 2022



**PATRICK S. OWEN**